Exhibit 7

Excerpts from the Supplemental Expert Report of Barbara Ann Frederiksen-Cross Taken in the *Rimini II* Case

REDACTED

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

RIMINI STREET, INC. a Nevada corporation
Plaintiff,
 	
v.
 	
ORACLE INTERNATIONAL CORPORATION, a California corporation, and ORACLE AMERICA, INC., a Delaware corporation
Defendant.
 	
ORACLE AMERICA, INC., a Delaware corporation, and ORACLE INTERNATIONAL CORPORATION, a California corporation,
 	
    Counterclaimants,
 	
    v.
 	
RIMINI STREET, INC. a Nevada corporation; SETH RAVIN, an individual,
 	
    Counterdefendants.
	CIVIL CASE NO. 2:14-cv-01699
	LRH-CWH

Supplemental Expert Report of Barbara Ann Frederiksen-Cross

Supplemental Expert Report of Barbara Frederiksen-Cross

C.   RIMINI'S DEVELOPMENT PROCESSES FOR PEOPLESOFT UPDATES MAXIMIZE CROSS-USE

195.   Rimini creates and distributes updates for both PeopleSoft HCM and PeopleSoft FSCM, and it did so tens of thousands of times during the Relevant Period. As explained in this report and reflected in Rimini's internal records, Rimini's process for developing updates involves extensive cross-use of Oracle's PeopleSoft software and derivative works based upon Oracle's PeopleSoft software.

196.   As ████████ stated in a ████████████ internal Rimini e-mail:

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197.   ████████ further explained: ████████████████████
██
████ [110]

198.   Rimini developers typically receive business requirements or functional specifications from someone else, whether internal to Rimini, from a customer, or from some other external source.

199.   Sometimes, Rimini reviews Oracle's updates and documentation for planned updates to determine what updates to create. For example, ████████████████████
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████████████ [111]

200.   Rimini developers often perform initial development to create a *prototype* in one environment, and then ████████████████████████████████████

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[109] Depo. Ex. 2063.
[110] Benge Depo. at 247:21-25.
[111] RSI2_022040149.

██████████████████████████████ into a technical specification stored in DevTrack. Technical specifications may also capture ████████████████████████████████.

201.   In many cases, as discussed below, the update resulting from initial development is copied and distributed to multiple Rimini customers, either directly or as part of a bundle.[112] Rimini uses internal tools to ██████████████████████████████ so that the updates developed in one environments can be used to benefit multiple environments. These Rimini tools are designed for the purpose of maximizing cross-use, which I understand to violate the license agreements of Rimini's customers.

202.   In some cases, ██████████████████████████████████

██

████████████████████████████ This is another kind of cross-use, because Rimini is once again using PeopleSoft software associated with one customer to benefit multiple customers.

203.   Rimini sometimes tasks ██████████████████████████ with

██████████████████████████████

204.   For some updates, Rimini ██████████ code generated in one environment into other environments, ██████████████████████. This is another kind of cross-use.[113] Rimini PeopleSoft developers continue to use and create copies and derivative works of Oracle software on Rimini's systems in this way. For instance, ██████████████████████

██

██████████████████████████████████.[114]

205.   Rimini's PeopleSoft Development team would have needed to hire additional developers if it were unable to utilize cross-use in its testing processes. For example, ████████████

████████████████████████████████████

██

███ .[115]

1.   Rimini's development and further modification of RS-prefixed files

206.   Rimini has created and distributed *RS-prefixed files*, or source code files starting with the string "RS," since at least mid-2010. *See, e.g.*, HCM101507 (introducing several RS-prefixed SQR and SQC files in June 2010).

207.   As is discussed in detail below, many of these files are in fact reproduced, re-factored, or re-architected Oracle files.

208.   SQR files, in particular, are likely to contain #include statements that reference Oracle SQC files. At or before runtime, these #include statements result in actual copying of Oracle source code into these files.[116]

209.   One of Rimini's primary purposes in creating RS-prefixed files is to create materials over which Rimini does not exercise any IP controls. Rimini continued to copy and store these files on its own computer systems throughout the Relevant Period, even after migration of local environments, in the "████████████████████" of Department Shares. Rimini continued to distribute these files in full, even after it began to obscure its patching and copying of Oracle files using AFW.

210.   Several Rimini employees testified that Rimini can do ████████████████ ██████████ . For example, Mr. Conley testified that █████████████████████████ ██ ████████████████████████████ [117]

211.   Rimini has removed Oracle's copyright statements from these files. That removal, coupled with the introduction of the RS prefix, appears to be designed to mislead customers into thinking that Rimini is developing updates from scratch, or at least to be designed to make Rimini's copying of Oracle code difficult to detect. Rimini documents show that it was Rimin's policy that ██ ██ For example, the following

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[115] Depo. Ex. 1971.
[116] Per conversation with Norm Ackermann.
[117] Conley Depo. at 181:7-11; *see also id.* at 170:9-171:11; Mandla Depo. at 190:15-22.
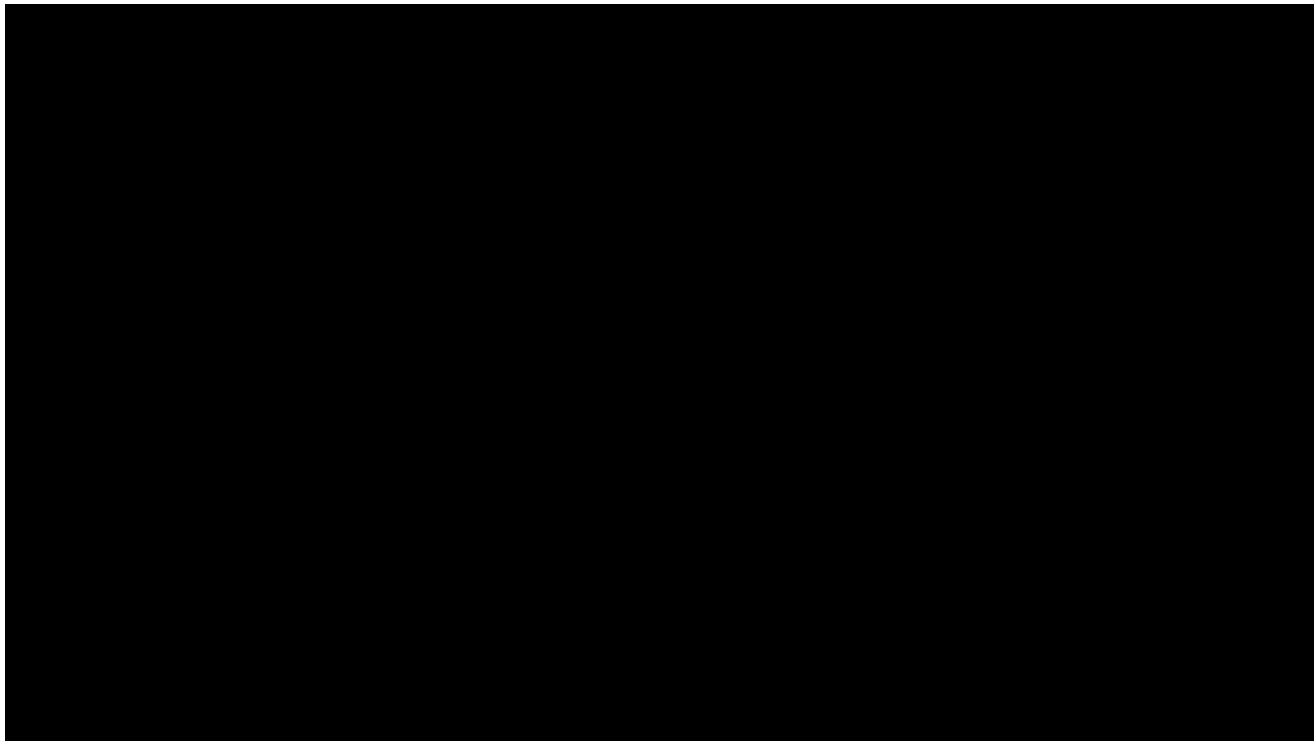
XIX.   RIMINI'S CONDUCT AFTER RIMINI FILED THE *RIMINI II* LAWSUIT AND AFTER THE *RIMINI I* VERDICT WAS REACHED

589.   I understand that Rimini filed its initial complaint in this matter on October 15, 2014.

590.   Based on my review of the evidence in this matter, Rimini did not make significant changes to its support practices related to updates to Oracle software on or around October 15, 2014.

591.   I understand that the jury in the *Rimini I* matter reached its verdict on October 13, 2015.

592.   Based on my review of the evidence in this matter, Rimini did not make significant changes to its support practices related to updates to Oracle software on or around October 13, 2015.

593.   Rimini continued to develop, test, and distribute updates for Oracle software that included materials copied from Oracle software after the complaint was filed in this matter and after the jury reached its verdict in *Rimini I*.

594.   Rimini continued to cross-use Oracle software environments and the updates that Rimini developed for Oracle software after the initial complaint was filed in this matter and after

the jury reached its verdict in *Rimini I*.

A.   RIMINI CONTINUED TO MAKE UPDATES THAT INCLUDED MATERIALS COPIED FROM ORACLE SOFTWARE

595.   Our analysis of the contents of Rimini updates that were transferred via AFW shows that even after Rimini filed its *Rimini II* Complaint, Rimini continued to include materials copied from Oracle software in the creation of its updates. For example, the revision headers in RSI programs such as rsi960st.sqr, ███████, rsi960us.sqr, ██████████, █████████, and ██████████, show Rimini continued to ███████████████████████████████████████ ██. As previously discussed in this report, all of these files include source code copied from Oracle's programs. Rimini then creates additional copies of these programs when their contents were embedded in AFW transactions in the AFW database. Additional copies of these programs were created on the environments associated with other Rimini customers, after the files were copied again to those environments. These environments are particularly noteworthy, since the update processing used by AFW results in the ████████████████████████████ ██████, for example copies placed in the ███████████████ directories, and a final copy that is staged to the ███████████████ for use in the running environment.

596.   Our analysis of these files shows that Rimini continued to update these files and create new copies of these files even after the Jury Verdict in *Rimini I* was issued on October 13, 2015.

B.   RIMINI CONTINUED TO DISTRIBUTE THESE UPDATES

597.   After Rimini filed its *Rimini II* complaint on October 15, 2014, Rimini continued its wholesale distribution of updates that contain material copied from Oracle.

598.   AFW records show that the transfer of a file developed in one prototype environment to a different target environment occurred at least ██████ in the time period since the *Rimini II* complaint was filed.[408] The AFW records also show that Rimini continued its distribution of ██████████████ to Oracle PeopleSoft programs during this time frame. AFW records show that at least █████ transfers of ██████████████ that were developed in a prototype

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[408] *See* Ex. E.01.

environment and then transferred to some other target environment occurred after the complaint was filed on October 15, 2014.[409]

599.   Rimini continued this distribution even after the jury verdict issued in *Rimini 1*. AFW records show at least ████ transfers of full files and ███ transfers of ████████ were developed in a prototype environment and then transferred to another environment occurred after the jury's verdict issued on October 13, 2015.[410]

C.   RIMINI CONTINUED TO "CROSS-USE" ENVIRONMENTS FOR UPDATE DEVELOPMENT AND TROUBLESHOOTING

600.   The AFW evidence shows that Rimini continued to use customer-licensed software for prototyping even after Rimini filed its *Rimini II* complaint on October 15, 2014. As previously explained, the use of a customer-licensed environment for prototype development and testing necessarily involves use of the Oracle application products and tools in that environment. Where these environments are based on the Oracle database, the Oracle database infrastructure and tools are also used.

601.   The use of customer-licensed software for prototyping continued after the jury's verdict in *Rimini I*.

D.   RIMINI CONTINUED TO USE AND "CROSS-USE" THE UPDATES IT DEVELOPED ON CUSTOMER-LICENSED SOFTWARE ENVIRONMENTS

602.   Rimini's updates continued to build on infringing updates from Rimini I and updates created through cross-use even after Rimini filed its *Rimini II* complaint on October 15, 2014 and after the jury's verdict was entered in *Rimini I*.

XX.   APPENDIX I: CASE STUDIES

A.   PEOPLESOFT CASE STUDIES: RIMINI UPDATES

603.   As discussed above, the following sections provide examples of the evidence and my analysis, as it relates to specific Rimini files, that Rimini RS-prefixed files include substantial amounts of PeopleSoft source code and reflect substantial non-literal copying, thereby creating what I understand to be derivative works.

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[409] *See* Ex. E.02.
[410] *See* Exs. E.03-E.04.

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████████████████████. Based on this analysis, it is my opinion that the list of files produced by Rimini Street in response to Interrogatory No. 25 is incomplete.

832.S8. At my direction, my team was also able to search Oracle GA software materials for files that matched the filenames of those found in Rimini's ████████████████████. Based on this analysis, I was able to find ██████ files whose filename matched those of files found in user-specific folders in Rimini's ████████████████████, and ██████ files whose distinct file path and filename combination matched those of files found in Rimini ████████████ folders. This file name matching implicates an additional ██████ Oracle GA files as potentially infringed, and further indicates that Rimini's response to Interrogatory 25 and related productions of files from its network drive was incomplete.

832.S9. Suppl. Ex. ZZZZ enumerates these files and provides additional details on our methodology.

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Barbara Frederiksen-Cross